

REMARKS

Claims 1-16, 18-37, 39-58, 60-79 and 81-84 are currently pending in the application. The amendments as indicated herein do not add any new subject matter as support may be found, for example, in paragraphs [0043] and [0062]. Further, the Applicants respectfully assert, that the amendments as indicated herein do not necessitate a new search.

REJECTIONS UNDER 35 U.S.C. § 112

Claims 22-37, 39-42, and 64 are rejected under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement for lack of support of the element "computer-readable storage medium". The claims now recite a "computer-readable volatile media or non-volatile medium". No new matter is added by way of this amendment as support may be found, for example, in paragraph [0062] of the Specification ("computer-readable medium...may take many forms, including but not limited to, non-volatile media, volatile media..."). Accordingly, withdrawal of this rejection is respectfully requested.

Claims 7-9, 28-30, 49-51, and 70-72 are rejected as allegedly failing to comply with the written description requirement because "there is no support in the specification for utilizing both alarm identification components together", where "one alarm identification component, as outlined in claim 1, is in the device generating said alarm, and the other alarm identification component...is in a different device." *See* Office Action dated July 1, 2008 at pages 5 and 6. This rejection is respectfully traversed.

The Specification explicitly states that the "AIC [(alarm identification component)] 140 may be deployed within alarm system 100 at two or more different positions". *See* paragraph [0023] of the Specification. Furthermore, "the entity that generates the alarm may

be a different entity than the entity that detected the event in step 202". *See* paragraph [0036] of the Specification. Therefore, contrary to the assertions of the Office Action dated July 1, 2008, the Specification provides explicit support for using multiple alarm identification components together, where one alarm identification component is in the device generating the alarm and the other alarm identification component is in a different device. Accordingly, withdrawal of this rejection is respectfully requested.

REJECTIONS UNDER 35 U.S.C. § 101

Claims 43-48 and 60-63 are rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter for "being potentially embodied only in software." *See* Office Action dated July 1, 2008 at page 6.

Claim 43, as amended, recites in part, "one or more processors..." A processor is a hardware element and therefore, cannot be embodied only in software. Therefore, Claim 43, as amended complies with the statutory requirements of 35 U.S.C. § 101. Claims 44-48 and 60-63 depend from Claim 43 and comply with the statutory requirements of 35 U.S.C. § 101 on that basis. Accordingly, withdrawal of this rejection is respectfully requested.

REJECTION UNDER 35 U.S.C. § 103

Claims 1-9, 11-16, 18, 20-30, 32-37, 39, 41-51, 53-58, 60, 62-72, 74-81, 83 and 84 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Levi (U.S. 6,636,983 B1) in view of Lecheler et al. (U.S. 6,425,008 B1), hereafter Lecheler, further in view of Natarajan et al. (U.S. 2002/0156882 A1), hereafter Natarajan, and Goudreau (U.S. 2004/0213224 A1). This rejection is respectfully traversed.

Claim 1 recites, in part:

the alarm identification component augmenting the alarm with identification information to create an augmented alarm, wherein the identification information uniquely identifies the particular site among the plurality of sites...

wherein the step of augmenting the alarm further comprises:

determining whether the identification information can be created based on a table that maps network device addresses to identification information;

when the identification information can not be created based on the table, determining whether the identification information can be created based on an address of an edge router for the particular site...

Accordingly, Claim 1 recites "prioritizing the use of said mapping table over said edge router information". *See* Office Action dated July 1, 2008 at page 9. Claims 22, 43, and 64 include similar limitations.

As indicated in the Office Action, "Levi in view of Lecheler and Natarajan do not show prioritizing the use of said mapping table over said edge router information." *See id.* Further, Goudreau does not provide what Levi, Lecheler and Natarjan lack.

As an initial matter, the Office Action clearly states that "Goudreau does not teach what was cited; utilizing a mapping table... in preference to utilizing traditional edge router classification. However, the traditional edge router approach discussed in paragraph 16 [of Goudreau] remains an option, as Goudreau does not see any disadvantages in this approach for small networks." *See* Office Action dated July 1, 2008 at page 4. The Supreme Court in KSR noted that the analysis supporting a rejection under 35 U.S.C. § 103 should be made explicit. *See* MPEP § 2141(III). Applicants note that "all words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). As indicated in the Office Action, none

of the references teach or suggest actually "prioritizing the use of said mapping table over said edge router information".

Furthermore, whether the "traditional edge router approach... remains an option" as an alternate method to mapping, as described in Goudreau, is irrelevant in implementing a prioritization technique for the use of a mapping table over edge router information, as recited in Claim 1. The Office Action suggests that because the traditional edge router approach is described as an option in Goudreau and the mapping approach which has advantages over the traditional edge router approach is described as another option in Goudreau, that Goudreau therefore describes implementing prioritization of the use of a mapping table over edge router information. Applicants respectfully disagree.

Simply describing two approaches where one approach has advantages over the other, as described in Goudreau, is not equivalent to disclosing or teaching a method that actually uses a prioritization technique of one approach over another approach, as recited in Claim 1. The description in Goudreau provides no suggestion to a skilled artisan to actually implement the claimed method. Goudreau describes the traditional router edge approach for small networks and a mapping approach for moderate to large networks to avoid bottlenecks. *See* Office Action dated July 1, 2008 at page 4. *See also*, Goudreau, paragraphs [0004]-[0007] and [0009]. Accordingly, the mapping approach of Goudreau is an alternate approach for moderate to large networks to avoid bottlenecks. The alternate mapping approach of Goudreau is never used in combination with the traditional router edge approach via a prioritization technique, as recited in Claim 1. Prioritizing the use of a mapping table over edge router information, as recited in Claim 1, is based on "whether the identification information can be created based on a table that maps network device addresses to

identification information". A thorough review of Goudreau reveals that Goudreau is completely silent about any method or device for actually prioritizing the use of mapping information over router edge information approach based on whether the identification information can or cannot be created based on a table that maps network device addresses to identification information, as recited in Claim 1.

Therefore, Claims 1, 22, 43, and 64 are patentable over Levi in view of Lecheler, Natarajan, and Goudreau. The remaining Claim depend from Claims 1, 22, 43, and 64, and are patentable over the cited references at least on that basis.

Claims 10, 31, 52 and 73 were rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Levi in view of Lecheler, Natarajan and Goudreau, further in view of Perkins (SNMP Alarms and MIB Module). This rejection is respectfully traversed.

As described above, Claims 1, 24, 43, and 64 are patentable Levi in view of Lecheler, Natarajan, and Goudreau. Perkins does not provide what Levi, Lecheler, Natarajan and Goudreau lack. Therefore, Claims 1, 24, 43, and 64 are patentable over Levi in view of Lecheler, Natarajan, Goudreau, and Perkins. Claims 10, 31, 52, and 73 depend from Claims 1, 24, 43, and 64, and are patentable at least on that basis.

Claims 19, 40, 61 and 82 were rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Levi in view of Lecheler, Natarajan, Goudreau, and further in view of Dacier et al. (U.S. 2003/0110398), hereafter Dacier. This rejection is respectfully traversed.

As described above, Claims 1, 24, 43, and 64 are patentable Levi in view of Lecheler, Natarajan, and Goudreau. Dacier does not provide what Levi, Lecheler, Natarajan and Goudreau lack. Therefore, Claims 1, 24, 43, and 64 are patentable over Levi in view of

Lecheler, Natarajan, Goudreau, and Perkins. Claims 19, 40, 61 and 82 depend from Claims 1, 24, 43, and 64, and are patentable at least on that basis.

CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

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